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Mr. Brian Sierant
Water Quality Division (MC-150)
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087
Brian.Sierant@tceq.texas.gov

Re: Stakeholder Comments, 30 TEX. ADMIN. CODE Chapter 312 Biosolids

Dear Mr. Sierant:

I am writing today to offer my thoughts and comments on the proposed amendments to the TAC, Title 30, Chapter 312 regulations. From listening to the webcast of the October 30, 2017 meeting it seems that the commission has already made up its mind to ban the land application of any WWTP sludge mixed with any processed grit trap or grease trap waste. I believe this is a rash decision brought about by political pressure caused by the spreading of fear among the residents of Victoria County and nearby areas.

I am a certified professional agronomist (CPAg.) and I have studied the movement and degradation of many products in soils over the 44 years that I worked at Texas A&M University (1971-2015). I think it is fair to say that we all agree that we support the land application of sewage sludge for beneficial use. By this we understand that sewage sludge contains plant nutrients (fertilizer if you will) and will promote crop growth and use of the nutrients. This helps grow crops and reduces the need for added chemical fertilizer without endangering the environment.

When done properly, the addition of a processed grit trap waste and grease trap waste to the sewage sludge does not by itself cause the sludge to become harmful to the environment. Grit trap and grease trap wastes are primarily organic in nature and will readily degrade within 90 days in the soil environment resulting in production of a humus type material that will improve soil structure and increase water and nutrient retention of the soil. In addition, it will help to sequester carbon in the soil to offset the increased carbon dioxide released to the atmosphere. Finally, it will help keep useful products out of the landfills which, as you know, are very expensive to permit, build, and operate.

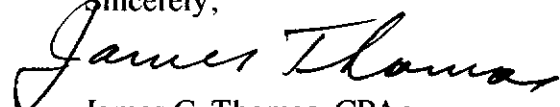
If the grit trap and grease trap wastes are collected from carefully selected businesses, then the potential for contamination by environmentally harmful constituents is minimal. However, I also realize that the potential for adding potentially dangerous constituents does exist, particularly for wastes coming from heavily industrialized areas

of the state. Therefore, I strongly recommend that you include a provision in the revised regulations to allow for application of sewage sludge mixed with grit trap waste and grease trap waste provided that the following criteria are met:

1. The final sludge to be land applied is tested at a frequency that TCEQ determines using test procedures such as TCLP that TCEQ specifies.
2. The final sludge to be land applied meets a published set of criteria for the tests in item 1 above.
3. The sludge application rate is based on a nutrient management plan and similar considerations as is typical of current WWTP sludge applications and permits.
4. There is a more rigorous soil sampling program at the land treatment site to monitor soil conditions and ensure environmental protection.

I urge you as stewards of our state's natural resources to make your decision based on what is in the best interest of the State of Texas using the scientific studies and data collected to date as the foundation for your decision and do not base it on people's irrational fears of the unknown.

Please feel free to contact me by email or phone should you have any questions about these issues or if I may be of assistance in any way.

Sincerely,

James C. Thomas, CPAg.